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Attorneys for the Industrial Customers of Idaho Power

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IDAHO PUBLIC
UTILITIES COMMISSION

BEFORE THE
IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE APPLICATION OF)	
IDAHO POWER COMPANY FOR AN ORDER)	CASE NO. IPC-E-15-26
APPROVING THE TRANSFER AND SALE)	PETITION TO INTERVENE
OF CERTAIN ASSETS TO THE UNITED)	OF THE INDUSTRIAL CUSTOMERS
STATES DEPARTMENT OF JUSTICE)	OF IDAHO POWER
FEDERAL BUREAU OF INVESTIGATION.)	

COMES NOW, The Industrial Customers of Idaho Power, hereinafter referred to as
“Intervenor,” and pursuant to this Commission’s Rules of Procedure, Rule 71 IDAPA
31.01.01.71 hereby petitions the Commission for leave to intervene herein and to appear and
participate herein as a party, and as grounds therefore states as follows:

1. The name and address of this Intervenor is:

Industrial Customers of Idaho Power
c/o Peter J. Richardson
Richardson Adams, PLLC
515 N. 27th St
P.O. Box 7218
Boise, Idaho 83702
Telephone: (208) 938-7901
Fax: (208) 938-7904
peter@richardsonadams.com

Copies of all pleadings, production requests, production responses, Commission orders

and other documents should be provided to Peter Richardson as noted above and to:

Dr. Don Reading
6070 Hill Road
Boise, Idaho 83703
(208) 342-1700 Tel
(208) 383-0401 Fax
dreading@mindspring.com

2. This Intervenor, the Industrial Customers of Idaho Power, ("ICIP") is an unincorporated association of Schedule 19 customers of Idaho Power. All ICIP members receive electric utility services from Idaho Power Company. The ICIP claims a direct and substantial interest in this proceeding in that its members are interested in the administration and application of Idaho Power's Rule M as its members have an interest in Idaho Power owned facilities beyond the point of delivery. In addition the ICIP members are interested as to the impact of the administration of Rule M on Schedule 19 retail rates.

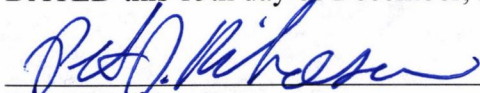
3. This Intervenor, in its capacity as a representative of industrial customers intends to participate herein as a party, and if necessary, to introduce evidence, cross-examine witnesses, call and examine witnesses, and be heard in argument. The nature and quality of evidence which this Intervenor will introduce is dependent upon the nature and effect of other evidence in this proceeding.

5. Without the opportunity to intervene herein, this Intervenor would be without any means of participation in this proceeding which may have a material impact on the rates its members pay for electric service.

6. Granting this Intervenor's petition to intervene will not unduly broaden the issues nor will it prejudice any party to this case.

WHEREFORE, the Industrial Customers of Idaho Power respectfully requests that this Commission grant its Petition to Intervene in these proceedings and to appear and participate in all matters as may be necessary and appropriate; and to present evidence, call and examine witnesses, present argument and to otherwise fully participate in these proceedings.

DATED this 15th day of December, 2015



Peter J. Richardson
RICHARDSON ADAMS, PLLC

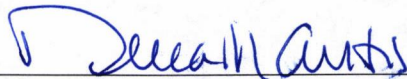
CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 15th day of December, 2015, a true and correct copy of the within and foregoing PETITION TO INTERVENE BY THE INDUSTRIAL CUSTOMERS OF IDAHO POWER in Docket No. IPC-E-15-26 was served electronically and by HAND DELIVERY, to:

Lisa Nordstrom
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Nina Curtis
Administrative Assistant